

Anthony Campbell v. Isolations Technologies  
and Larry D'amato, Operations Manager.  
MCAD DOCKET NO: 02SEM02493  
Answers to Respondent's Production Request.

PAGE 1 AUGUST 22, 2003

## PRODUCTION REQUEST

1. I was discriminated against by Isolations Technologies and Larry D'amato in violation of M.G.L. c.151B §4(1) and Title VII of the Civil Rights Act. (a) On March 29, 2002, Larry D'amato approached me while working and asked if it was true that I was interested in working full-time and/or being hired directly through Isolations Technologies. I replied definitely interested. Mr. D'amato responded, "That will not happen. A black person will never work full-time for Isolations Technologies. You were brought here just as a cover but will never be hired by Isolations Technologies. Stay with Excel".

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4. On or around June 21, 2002, July 19, 2002 and August 23, 2002, Certified Letters were sent to Paul Fattercofeit, Excel Staffing, 22 Water Street, Westborough, MA 01581, requesting my personnel file but are not limited to start pay rate, performance reviewed, end pay rate, position and hours worked. Also, reason(s) given for termination by Isolations Technologies (IT) but refused request. The letters of June 21, 2002 and July 19, 2002 were signed for but the letter of August 23, 2002 was returned, refused or Name unknown --- Mr. Paul Fattercofeit.

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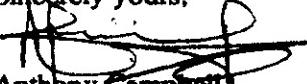
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10. This was reported to the Commonwealth of Massachusetts Commission Against Discrimination, Office of the Attorney General Of the Commonwealth Of Massachusetts, the Commonwealth of Massachusetts Labor Inspector Department.

Kind regards!

Sincerely yours,

  
Anthony Campbell  
COMPLAINANT

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## INTERROGATORIES

1. (a) My job performance was excellent at Isolations Technologies.  
(b) This was reported to the Commonwealth Of Massachusetts Commission Against Discrimination, the Office of the Attorney General Of the Commonwealth Of Massachusetts, the Commonwealth of Massachusetts Labor Inspector Department.  
(c) Once the Operations Manager, Mr. Larry D'amato made it known that Isolations Technologies was not going to hire a black person work full-time in the past, present, or future.  
(d) I was discriminated against by Isolations Technologies and Larry D'amato in violation of M.G.L. c.151B §4(1) and Title VII of the Civil Rights Act. (a) On March 29, 2002, Larry D'amato approached me while working and asked if it was true that I was interested in working full-time and/or being hired directly through Isolations Technologies. I replied definitely interested. Mr. D'amato responded, "That will not happen. A black person will never work full-time for Isolations Technologies. You were brought here just as a cover but will never be hired by Isolations Technologies. Stay with Excel".

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2. Operations Manager, Larry D'amato

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4. This was reported to the Commonwealth Of Massachusetts Commission Against Discrimination, the Office of the Attorney General Of the Commonwealth Of Massachusetts, the Commonwealth of Massachusetts Labor Inspector Department.

5. JOB SEARCHING

6. Coming NetOptix  
2 Mercer Road  
Natick, MA 01760

POSITION: PT---QUALITY CONTROL SUPERVISOR  
JOB DUTIES: MANAGEMENT, TRAINING & DEVELOPMENT, PERSONNEL  
SCHEDULING AND ANALYTICAL/PROBLEM SOLVING.  
DOH: December 19, 2000 ---- May 15, 2001  
SUPERVISOR: SUE BATES  
REASON FOR LEAVING: NATICK DIVISION CLOSED DOWN

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RHODE ISLAND TOOL COMPANY  
148 West River Street  
Providence, RI 02908  
POSITION: MACHINIST  
JOB DUTIES: SET-UP, EDITING AND TROUBLESHOOTING  
DOH: January 10, 2000 --- March 16, 2001  
SUPERVISOR: BUTCH  
HOURLY RATE: \$16.09  
REASON FOR LEAVING: LAYOFF NO WORK.

SWISSTURN-U.S.A  
1 Main Street  
Whittinsville, MA  
POSITION: MACHINIST (TEMPORARY)  
DOH: May 2002 -- August 23, 2002  
JOB DUTIES: SET-UP, EDITING AND TROUBLESHOOTING  
HOURLY RATE: \$16.00  
REASON FOR LEAVING: TEMPORARY NO WORK

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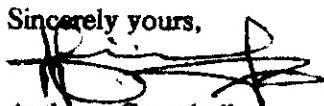
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## ADMISSION

1. In or around September, 2001, I was hired as Programmer/Machinist by Excel Staffing for assignment at Isolations Technologies as Machinist/Programmer.
2. Yes, I was interviewed.
3. Hired by Excel Staffing as Programmer/Machinist to work at Isolations Technologies as Machinist/Programmer.
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5. NO.
6. I did not speak nor discuss with Peter Zekos on anything because the employment offer was never made nor hired.
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8. I did not speak nor discuss with Peter Zekos on anything because the employment offer was never made nor hired.

9. I did report this to the Commonwealth of Massachusetts Commission Against Discrimination, the Office Of the Attorney General Of the Commonwealth of Massachusetts, the Commonwealth of Massachusetts Labor Inspector Department.

10. I was discriminated against by Isolations Technologies and Larry D'amato in violation of M.G.L. c.151B §4(1) and Title VII of the Civil Rights Act. (a) On March 29, 2002, Larry D'amato approached me while working and asked if it was true that I was interested in working full-time and/or being hired directly through Isolations Technologies. I replied definitely interested. Mr. D'amato responded, "That will not happen. A black person will never work full-time for Isolations Technologies. You were brought here just as a cover but will never be hired by Isolations Technologies. Stay with Excel".

Isolations Technologies & Larry D'amato discriminated against me by failing to consider to hire me based on race/color (Black), in violation of M.G.L. c. 151B §4(1) and Title VII of the 1964 Civil Rights Act. (b) A few moment later, Mr. D'amato approached me again and said, "I am the power who hires and fires, there will be no blacks ever to be hired by Isolations Technologies in the past, present, or future". I asked him if that's why there was not a single black employee at

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and Larry D'amato, Operations Manager.  
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Isolations, and he said yes. I asked him if the owner, Micheal Rigolli, supported his view. Mr. D'amato stated that Micheal didn't have the power to hire and fire. He then stated that because he (Mr. D'amato) was Italian, he was the one with the power. After our conversation, I spoke with Steve (LNU) in the Quality Control. Steve informed me that Micheal Rigolli will be out of the office the next three days.

Isolations Technologies & Larry D'amato discriminated against me by failing to consider to hire me based on race/color (Black), in violation of M.G.L. c.151B §4(1) and Title VII of the 1964 Civil Rights Act." On April 2, 2002, I received a call from Paul, an employee at Excel Staffing, who informed me that I was no longer needed at Isolations Technologies according to Larry D'amato. While I had been working at Isolations, I saw many white individuals with little or no experience get hired. I believe I was more qualified for many positions into which white individuals were hired.

11. I did report this to the Commonwealth of Massachusetts Commission Against Discrimination, the Office Of the Attorney General Of the Commonwealth of Massachusetts, the Commonwealth of Massachusetts Labor Inspector Department.

12. I did report this to the Commonwealth of Massachusetts Commission Against Discrimination, the Office Of the Attorney General Of the Commonwealth of Massachusetts, the Commonwealth of Massachusetts Labor Inspector Department.

13. I did report this to the Commonwealth of Massachusetts Commission Against Discrimination, the Office Of the Attorney General Of the Commonwealth of Massachusetts, the Commonwealth of Massachusetts Labor Inspector Department.

Kind regards!

Sincerely yours,



Anthony Campbell  
COMPLAINANT

**COMMONWEALTH OF MASSACHUSETTS  
COMMISSION AGAINST DISCRIMINATION**

**POST-DETERMINATION DISCOVERY ORDER**

IN THE MATTER OF Campbell v. Isolations Technologies  
DOCKET NUMBER: 0223C0493

The Investigating Commissioner has issued a Probable Cause determination in this matter. Pursuant to this Order, the parties may engage in discovery pursuant to 804 C.M.R. 1.19.

Requests for discovery including, but not limited to interrogatories, requests for documents and admissions, and depositions shall be completed and filed with the Commission within 3 months of the date of issuance of this Order.

Counsel for the parties are hereby authorized to issue subpoenas pursuant to 804 C.M.R. 1.14.

All original copies of discovery requests and responses, including transcripts of depositions, shall be filed as follows:

Boston SEM, BCR, BED, BPH, BPR, BPA  
Enforcement Clerk  
Commission Against Discrimination  
One Ashburton Place, Room 601  
Boston, MA 02108

Springfield SEM, SCR, SED, SPH, SPR, SPA  
Enforcement Clerk  
Commission Against Discrimination  
436 Dwight St., Suite 220  
Springfield, MA 01103

Upon the conclusion of the discovery period, the parties shall attend a Certification Conference pursuant to 804 CMR 1.20. Please see the reverse side of this Order for information concerning scheduling the Certification Conference.

This Order shall operate prospectively.

Dorca I. Gomez, Chairwoman

Cynthia A. Tucker, Commissioner

ISSUED Date: 4/03/03  
DISC-MCAD-Aug2000

by: Gretel L. Tucker  
Investigating Commissioner (or designee)